

**PART II OF INDEX OF DOCUMENTS RELEASED IN FULL  
IN RESPONSE TO FOIA REQUEST NO. 9705050014**

<b>Document Number</b>	<b>Description</b>
13	4/1/85 letter from John M. Newman, Jr. of Jones, Day, Reavis & Pogue, counsel for Brush Wellman, to Theodore J. Garrish, DOE General Counsel, to make demand upon the U.S. to indemnify Brush in <u>Cook v. General Electric Co. and Brush Wellman Inc.</u> , Case No. 85-087600 (Court of Common Pleas, Cuyahoga County, Ohio); with enclosed copy of Complaint
14	4/1/85 letter from John M. Newman, Jr. of Jones, Day, Reavis & Pogue, counsel for Brush Wellman, to Richard K. Willard, Acting Assistant Attorney General, Civil Division, U.S. Department of Justice, to make demand upon the U.S. to indemnify Brush in <u>Cook v. General Electric Co. and Brush Wellman Inc.</u> , Case No. 85-087600 (Court of Common Pleas, Cuyahoga County, Ohio)
15	4/1/85 letter from John M. Newman, Jr. of Jones, Day, Reavis & Pogue, counsel for Brush Wellman, to Patrick M. McLaughlin, U.S. Attorney, Northern District of Ohio, to make demand upon the U.S. to indemnify Brush in <u>Cook v. General Electric Co. and Brush Wellman Inc.</u> , Case No. 85-087600 (Court of Common Pleas, Cuyahoga County, Ohio)
16	4/4/85 letter from Jeffrey Axelrad, Director, Torts Branch, Civil Division, U.S. Department of Justice, to Joseph DiStefano, DOE Assistant General Counsel for General Litigation, re Brush Wellman's demand that the U.S. indemnify Brush in <u>Cook v. General Electric Co. and Brush Wellman Inc.</u> , Case No. 85-087600 (Court of Common Pleas, Cuyahoga County, Ohio)
17	12/4/85 letter from Janet L. Miller of Jones, Day, Reavis & Pogue, counsel for Brush Wellman, to DOE attorney Michele Reynolds, re Contract No. AT(30-1)-541 (through Modification No. 35) between Brush Beryllium Co. and the AEC
18	2/25/88 letter from Janet L. Miller of Jones, Day, Reavis & Pogue, counsel for Brush Wellman, to DOE attorney Michele Reynolds, re Brush's demand that the U.S. indemnify Brush in <u>Cook v. General Electric Co. and Brush Wellman Inc.</u> , Case No. 85-087600 (Court of Common Pleas, Cuyahoga County, Ohio)
19	4/22/88 letter from Janet L. Miller of Jones, Day, Reavis & Pogue, counsel for Brush Wellman, to DOE attorney Robin A. Henderson, re Brush's demand that

the U.S. indemnify Brush in Cook v. General Electric Co. and Brush Wellman Inc., Case No. 85-087600 (Court of Common Pleas, Cuyahoga County, Ohio)

- 20 5/4/88 routing and transmittal slip from DOE attorney Michele Reynolds to James A. Stout, Chief Counsel, DOE Albuquerque Operations Office, re Brush's Wellman's demand that the U.S. indemnify Brush in Cook v. General Electric Co. and Brush Wellman Inc., Case No. 85-087600 (Court of Common Pleas, Cuyahoga County, Ohio)
- 21 1/28/87 letter from Janet L. Miller of Jones, Day, Reavis & Pogue, counsel for Brush Wellman, to J. Michael Farrell, DOE General Counsel, to make demand upon the U.S. to indemnify Brush in Molter v. Brush Wellman Inc., Case No. 86-4075 (Court of Common Pleas, Lucas County, Ohio); with enclosed copies of Summons and Complaint
- 22 1/28/87 letter from Janet L. Miller of Jones, Day, Reavis & Pogue, counsel for Brush Wellman, to DOE attorney Robin A. Henderson, to make demand upon the U.S. to indemnify Brush in Molter v. Brush Wellman Inc., Case No. 86-4075 (Court of Common Pleas, Lucas County, Ohio)
- 23 1/28/87 letter from Janet L. Miller of Jones, Day, Reavis & Pogue, counsel for Brush Wellman, to Richard K. Willard, Assistant Attorney General, Civil Division, U.S. Department of Justice, to make demand upon the U.S. to indemnify Brush in Molter v. Brush Wellman Inc., Case No. 86-4075 (Court of Common Pleas, Lucas County, Ohio)
- 24 1/28/87 letter from Janet L. Miller of Jones, Day, Reavis & Pogue, counsel for Brush Wellman, to Patrick M. McLaughlin, U.S. Attorney, Northern District of Ohio, to make demand upon the U.S. to indemnify Brush in Molter v. Brush Wellman Inc., Case No. 86-4075 (Court of Common Pleas, Lucas County, Ohio)
- 25 4/27/88 letter from Janet L. Miller of Jones, Day, Reavis and Pogue, counsel for Brush Wellman, to Henry A. Gill, Jr., DOE Deputy General Counsel for Litigation, to make demand upon the U.S. to indemnify Brush in Breen v. Brush Wellman Inc., Case No. 573999-2 (California Superior Court, Alameda County); with enclosed copies of Complaint and First Amended Complaint
- 26 4/27/88 letter from Janet L. Miller of Jones, Day, Reavis and Pogue, counsel for Brush Wellman, to Civil Division, U.S. Department of Justice, Attention: Assistant Attorney General, to make demand upon the U.S. to indemnify Brush in Breen v. Brush Wellman Inc., Case No. 573999-2 (California Superior Court, Alameda County)

- 27 4/27/88 letter from Janet L. Miller of Jones, Day, Reavis and Pogue, counsel for Brush Wellman, to Patrick M. McLaughlin, U.S. Attorney, Northern District of Ohio, to make demand upon the U.S. to indemnify Brush in Breen v. Brush Wellman Inc., Case No. 573999-2 (California Superior Court, Alameda County)
- 28 5/10/88 letter from Henry A. Gill, Jr., DOE Deputy General Counsel for Litigation, to Janet L. Miller of Jones, Day, Reavis & Pogue, counsel for Brush Wellman, re Brush's demand that the U.S. indemnify Brush in Breen v. Brush Wellman Inc., Case No. 573999-2 (California Superior Court, Alameda County)
- 29 4/18/97 letter from Mark J. Andreini of Jones, Day, Reavis & Pogue, counsel for Brush Wellman, to Eric J. Fygi, DOE Acting General Counsel, to make demand upon the U.S. to indemnify Brush in Whitaker v. Brush Wellman Inc., Case No. 314064 (Court of Common Pleas, Cuyahoga County, Ohio); Starin v. Brush Wellman Inc., Case No. 321428 (Court of Common Pleas, Cuyahoga County, Ohio); and Johnson v. Brush Wellman Inc., Case No. 326113 (Court of Common Pleas, Cuyahoga County, Ohio); with enclosed copies of all three Complaints
- 30 5/28/97 letter from Mark J. Andreini of Jones, Day, Reavis & Pogue, counsel for Brush Wellman, to Eric J. Fygi, DOE Acting General Counsel, re Brush's demand that the U.S. indemnify Brush in Whitaker v. Brush Wellman Inc., Case No. 314064 (Court of Common Pleas, Cuyahoga County, Ohio); Starin v. Brush Wellman Inc., Case No. 321428 (Court of Common Pleas, Cuyahoga County, Ohio); and Johnson v. Brush Wellman Inc., Case No. 326113 (Court of Common Pleas, Cuyahoga County, Ohio); with enclosed copies of Brush's Motion to Strike Class Action Allegations, and Plaintiffs' Response to Defendant's Motion, in Whitaker
- 31 10/10/97 letter from Mark J. Andreini of Jones, Day, Reavis & Pogue, counsel for Brush Wellman, to Eric J. Fygi, DOE Acting General Counsel, re Brush's demand that the U.S. indemnify Brush in Starin v. Brush Wellman Inc., Case No. 321428 (Court of Common Pleas, Cuyahoga County, Ohio)
- 32 10/10/97 letter from Mark J. Andreini of Jones, Day, Reavis & Pogue, counsel for Brush Wellman, to Marc Johnston, DOE Deputy General Counsel for Litigation, re Brush's demand that the U.S. indemnify Brush in Starin v. Brush Wellman Inc., Case No. 321428 (Court of Common Pleas, Cuyahoga County, Ohio)
- 33 10/10/97 letter from Mark J. Andreini of Jones, Day, Reavis & Pogue, counsel for Brush Wellman, to DOE attorney Stephen Dove, re Brush's demand that the U.S. indemnify Brush in Starin v. Brush Wellman Inc., Case No. 321428 (Court of Common Pleas, Cuyahoga County, Ohio)

- 34 3/15/99 letter from James C. Venizelos of Venizelos & Associates, counsel for Brush Wellman, to Marc Johnston, DOE Deputy General Counsel for Litigation, re Brush's demand that the U.S. indemnify Brush in Starin v. Brush Wellman Inc., Case No. 321428 (Court of Common Pleas, Cuyahoga County, Ohio), and Johnson v. Brush Wellman Inc., Case No. 326113 (Court of Common Pleas, Cuyahoga County, Ohio)
- 35 6/28/99 memorandum from Jake J. Chavez, Assistant Chief Counsel for Litigation, DOE Albuquerque Operations Office, to DOE attorney Stephen Dove, re Brush Wellman's demand that the U.S. indemnify Brush in Starin v. Brush Wellman Inc., Case No. 321428 (Court of Common Pleas, Cuyahoga County, Ohio), and Johnson v. Brush Wellman Inc., Case No. 326113 (Court of Common Pleas, Cuyahoga County, Ohio)
- 36 7/7/99 telefax from James C. Venizelos of Venizelos & Associates, counsel for Brush Wellman, to DOE attorney Stephen Dove, with enclosed copy of unsigned Release Of Claims By Brush Wellman Inc., re claims for allowable costs under Contract No. AT(30-1)-541 arising out of litigation and/or settlement of Starin v. Brush Wellman Inc., Case No. 321428 (Court of Common Pleas, Cuyahoga County, Ohio), and Johnson v. Brush Wellman Inc., Case No. 326113 (Court of Common Pleas, Cuyahoga County, Ohio)
- 37 7/21/99 letter from Theresa R. Haumann, Document Specialist/Attorney I, Brush Wellman Inc., to Marc Johnston, DOE Deputy General Counsel for Litigation, concerning Release Of Claims By Brush Wellman Inc., re claims for allowable costs under Contract No. AT(30-1)-541 arising out of litigation and/or settlement of Starin v. Brush Wellman Inc., Case No. 321428 (Court of Common Pleas, Cuyahoga County, Ohio), and Johnson v. Brush Wellman Inc., Case No. 326113 (Court of Common Pleas, Cuyahoga County, Ohio)
- 38 7/22/99 letter from Theresa R. Haumann, Document Specialist/Attorney I, Brush Wellman Inc., to Marc Johnston, DOE Deputy General Counsel for Litigation, concerning Release Of Claims By Brush Wellman Inc., re claims for allowable costs under Contract No. AT(30-1)-541 arising out of litigation and/or settlement of Starin v. Brush Wellman Inc., Case No. 321428 (Court of Common Pleas, Cuyahoga County, Ohio), and Johnson v. Brush Wellman Inc., Case No. 326113 (Court of Common Pleas, Cuyahoga County, Ohio)
- 39 2/19/98 letter from Thomas E. Downey, Jr. of Downey & Knickrehm, counsel for Brush Wellman, to Marc Johnston, DOE Deputy General Counsel for Litigation, to make demand upon the U.S. to indemnify Brush in Ballinger v. Brush Wellman Inc., Civil Action No. 96CV2532-5 (District Court, Jefferson County, Colorado); with enclosed copies of Complaint and Jury Demand, Brush's Motion to Dismiss

and Alternative Motion for More Definite Statement, Amended Complaint and Jury Demand, Second Amended Complaint and Jury Demand, Brush's Answer to Second Amended Complaint, and Brush's Motion to Dismiss

- 40        10/20/99 letter from Thomas E. Downey, Jr. of Downey & Knickrehm, counsel for Brush Wellman, to Marc Johnston, DOE Deputy General Counsel for Litigation, and to DOE attorney Stephen Dove, re Brush's demand that the U.S. indemnify Brush in Ballinger v. Brush Wellman Inc., Civil Action No. 96CV2532-5 (District Court, Jefferson County, Colorado); with enclosed copy of 10/12/99 letter from James G. Heckbert, counsel for plaintiffs in Ballinger, to Thomas E. Downey, Jr.
- 41        1/14/00 letter from Jeffery D. Ubersax of Jones, Day, Reavis & Pogue, counsel for Brush Wellman, to Marc Johnston, DOE Deputy General Counsel for Litigation, to make demand upon the U.S. to indemnify Brush in Miller v. Brush Wellman Inc., Case No. 399172 (Court of Common Pleas, Cuyahoga County, Ohio); with enclosed copies of Summons and Complaint
- 42        3/21/00 letter from Jeffery D. Ubersax of Jones, Day, Reavis & Pogue, counsel for Brush Wellman, to Marc Johnston, DOE Deputy General Counsel for Litigation, to make demand upon the U.S. to indemnify Brush in Lemke v. Brush Wellman Inc., Case No. 398004 (Court of Common Pleas, Cuyahoga County, Ohio), and Reddin v. Brush Wellman Inc., Case No. 400384 (Court of Common Pleas, Cuyahoga County, Ohio); with enclosed copies of Complaint and Brush's Answer in Lemke, Complaint and Brush's Answer in Reddin, and Brush's First Amended Answer in Miller v. Brush Wellman Inc., Case No. 399172 (Court of Common Pleas, Cuyahoga County, Ohio)